

# **EXHIBIT 91**

12/5/2024

Richard Kadrey, et al. v. Meta Platforms, Inc.  
Highly Confidential - Subject to Protective Order

Sy Choudhury

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

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RICHARD KADREY, et al., )  
                              )  
Individual and         )  
Representative        )  
Plaintiffs,            )  
                          )  
v.                      ) Case No. 3:23-cv-03417-VC  
                          )  
META PLATFORMS, INC., )  
                          )  
Defendant.            )  
                          )

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\*\* HIGHLY CONFIDENTIAL SUBJECT TO PROTECTIVE ORDER \*\*

Videotaped Deposition of SY CHOWDHURY  
San Francisco, California  
Thursday, December 5, 2024

Reported Stenographically by  
Michael P. Hensley, RDR, CSR No. 14114

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1 Q. I'm afraid you have to share it.

2 A. I -- what's the question again?

3 Q. The question was do you believe that Meta  
4 should protect human creativity rather than exploit  
5 it?6 ATTORNEY HARTNETT: Are you asking for his  
7 personal opinion?8 ATTORNEY PRITT: Yes. This is his  
9 personal deposition.10 THE WITNESS: I don't really have an  
11 opinion --

12 ATTORNEY HARTNETT: Objection to form.

13 Go ahead.

14 THE WITNESS: -- whether Meta should or  
15 should not have that. There are some things I have  
16 an opinion on. Some things I really don't care.

17 BY ATTORNEY PRITT:

18 Q. Do you not care whether Meta protects  
19 human creativity rather than exploits it in  
20 connection with its LLMs?

21 ATTORNEY HARTNETT: Object to the form.

22 THE WITNESS: It's not something that I've

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1 given a lot of thought to; so my answer is I don't  
2 care at this point.

3 BY ATTORNEY PRITT:

4 Q. Did anyone other than the leaker express  
5 that they cared about whether Meta protected human  
6 creativity rather than exploited it in connection  
7 with its LLMs?

8 ATTORNEY HARTNETT: Object to the form.

9 THE WITNESS: I can't recall who the other  
10 two folks I would've thought were, but there must  
11 have been another two because I wouldn't have  
12 written three.

13 BY ATTORNEY PRITT:

14 Q. If you look at the top of the next page,  
15 Mr. Gamido says, "The agenda behind the article I  
16 believe" -- do you understand him to be referring to  
17 "The New York Times" article?

18 A. I imagine so.

19 Q. [As Read] The agenda behind "The  
20 New York Times" article is obvious, but I  
21 think the data need urgency is accurately  
22 reflected. These models are very data

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## CERTIFICATE OF SHORTHAND REPORTER

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3 I, Michael P. Hensley, Registered Diplomate  
4 Reporter for the State of California, CSR No. 14114,  
5 the officer before whom the foregoing deposition was  
6 taken, do hereby certify that the foregoing  
7 transcript is a true and correct record of the  
8 testimony given; that said testimony was taken by me  
9 stenographically and thereafter reduced to  
10 typewriting under my direction; that reading and  
11 signing was not requested; and that I am neither  
12 counsel for, related to, nor employed by any of the  
13 parties to this case and have no interest, financial  
14 or otherwise, in its outcome.

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Michael P. Hensley, CSR, RDR